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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF IDAHO

In re:)	Case No. 98-30052
)	
WILLIAM SHANE MOORE, aka)	MOTION TO MODIFY
Shane Moore, and)	CHAPTER 13 PLAN AND
LYNN MARIE MOORE, fka)	NOTICE OF HEARING
Lynn Oliver,)	
husband and wife,)	
)	
)	
Debtors.)	

COMES NOW THE UNDERSIGNED, attorney for debtors above-named, who respectfully moves the court for an order modifying the confirmed chapter 13 plan herein in the following respects:

1. Debtors will surrender all collateral (two vehicles) to Doug LaFord, dba Showroom Cars.
2. Debtors shall have no payments due the trustee for the months of October and November, 1998, to facilitate their move to Tennessee. No later than 1 November 1998 debtors will file amended schedules I and J and a motion to further modify this plan in a manner consistent with the amended schedules.
3. Effective date of modifications, if this motion is granted, should be upon entry of the order.

MOTION TO MODIFY CHAPTER 13 PLAN AND NOTICE OF HEARING -1-

29/30

All other provisions in the confirmed plan presently in force should be continued unchanged. her parties in interest.

NOTICE OF HEARING

TO: All parties in interest.

PLEASE TAKE NOTICE that the undersigned will call on for hearing the foregoing motion at the courtroom of the above-entitled court at the Federal Building, 220 E. 5th, Moscow, Idaho, on the 27th day of October, 1998, at the hour of 10:00 A.M. or as soon thereafter as counsel may be heard.

If any party plans to appear at the hearing and contest this motion, such party should file a formal objection to the motion and give due notice of such intent to the undersigned counsel to avoid delay in the litigation.

DATED this 18th day of September, 1998.

A handwritten signature in black ink, appearing to read 'Kenneth L. Anderson', is written over a horizontal line.

Kenneth L. Anderson
Attorney for Debtor